UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

NATIONAL RIFLE ASSOCIATION OF AMERICA,

Plaintiff,

-against-

ANDREW CUOMO, individually, and MARIA T. VULLO, individually,

Defendants.

18-cv-00566 (TJM/CFH)

NOTICE OF DEFENDANT MARIA T. VULLO'S MOTION TO STAY DISCOVERY PENDING APPEAL

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 26 and upon the accompanying memorandum of law and all prior papers and proceedings in this matter, Defendant Maria T. Vullo, by and through her attorneys, Emery Celli Brinckerhoff Abady Ward & Maazel LLP, on May 20, 2021 at 9:30 A.M., at the United States Courthouse for the Northern District of New York, located at the James T. Foley U.S. Courthouse, Suite 509, 445 Broadway, Albany, NY 12207, will move this Court, pursuant to Rule 26(c)(1), for a protective order staying all discovery in this case, together with such other or further relief as may be just. A court conference regarding the issues being presented in this motion was held before Magistrate Judge Christian F. Hummel on March 26, 2021 pursuant to Local Rule 7.1(b)(2).

PLEASE TAKE FURTHER NOTICE that, answering papers, if any, shall be filed on or before May 7, 2021 pursuant to the Court's March 30, 2021 Order, see Dkt. 330, and shall otherwise be filed in accordance with Local Rule 7.1.

Dated: April 9, 2021

New York, New York

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

By: ___/s/

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